

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
2004 AUG 23 P 3:14
C.A. NO. 04-11314-PBS

U.S. DISTRICT COURT
DISTRICT OF MASS

ST. PAUL TRAVELERS, as successor in
interest to ATLANTIC MUTUAL
INSURANCE CO. Marine Division, subrogee
of IBEX LLC, and IBEX, LLC

Plaintiffs

v.

FAIRHAVEN SHIPYARD, INC., and A.I.
MARINE ADJUSTERS, INC., a member of
AMERICAN INTERNATIONAL GROUP,
INC.,

Defendants

PLAINTIFF ST. PAUL TRAVELERS'
ASSENTED-TO MOTION FOR
LEAVE OF COURT TO ENLARGE
TIME WITHIN WHICH TO REPLY
OR OPPOSE DEFENDANT A.I.
MARINE ADJUSTERS INC.'S
MOTION TO DISMISS, OR IN THE
ALTERNATIVE TO SEVER AND
STAY

Now comes the plaintiff St. Paul Travelers, in the above-captioned action, and respectfully moves this Honorable Court for enlargement of time within which to reply, or oppose, the defendant A.I. Marine Adjusters, Inc.'s Motion to Dismiss, or in the Alternative to Sever and Stay. As grounds for its motion, St. Paul Travelers states as follows:

(1) Counsel for plaintiff will be on vacation during the time in which the reply or opposition memorandum will be due; and

(2) The parties have agreed that an enlargement of time within which to file or oppose until Monday, August 30, 2004 will not serve to prejudice either party.

WHEREFORE, the plaintiff respectfully requests this Honorable Court grant it an

enlargement of time within which to reply or oppose to the defendant A.I. Marine Adjusters Inc.'s motion until Monday, August 30, 2004.

Respectfully submitted,

Defendant,

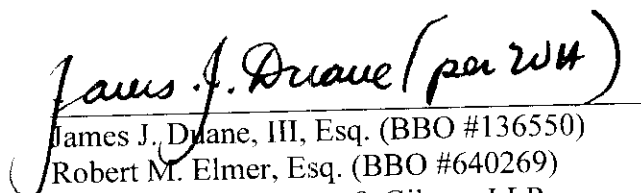
A.I. MARINE ADJUSTERS, INC.


By its attorney,

Plaintiffs,

ST. PAUL TRAVELERS as successor in
interest to ATLANTIC MUTUAL
INSURANCE CO. Marine Division, subrogee
of IBEX LLC, and IBEX, LLC

By their attorney,


James J. Duane, III, Esq. (BBO #136550)
Robert M. Elmer, Esq. (BBO #640269)
Taylor, Duane, Barton & Gilman LLP
111 Devonshire Street
Boston, MA 02109
(617) 654-8200


William Hewig, III (BBO# 541910)
Kopelman and Paige, P.C.
31 St. James Avenue
Boston, MA 02116
(617) 556-0007

CERTIFICATE OF SERVICE

I, William Hewig III, hereby certify that on the below date, I served a copy of the foregoing Plaintiff St. Paul Travelers' Assented-To Motion For Leave Of Court To Enlarge Time Within Which To Reply Or Oppose Defendant A.I. Marine Adjusters Inc.'S Motion To Dismiss, Or In The Alternative To Sever And Stay, by first class mail, postage prepaid, to the following counsel of record:

James J. Duane, III, Esq.
Robert M. Elmer, Esq.
Taylor, Duane, Barton & Gilman LLP
111 Devonshire Street
Boston, MA 02109

Dated: August 20, 2004


William Hewig III

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